

**IN THE CIRCUIT COURT OF THE CITY OF ST LOUIS  
STATE OF MISSOURI  
22<sup>nd</sup> JUDICIAL CIRCUIT**

ANTHONY TRUPIANO, )  
Plaintiff, )  
v. ) Cause No.  
BRADY HEADY, )  
Defendant, ) Division No.  
Serve Defendant at: )  
1701 BLUE JAY COVE )  
ST LOUIS MO 63144 )

**PETITION FOR DAMAGES**

COMES NOW Plaintiff Anthony Trupiano ("Plaintiff") and for his cause of action against Defendant Brady Heady, states as follows:

1. Plaintiff is now and was at all times herein mentioned a resident and citizen of the State of Missouri.
2. Defendant is now and was at all times herein mentioned a resident and citizen of the State of Illinois.
3. Lafayette, at and near its intersection with S. 9<sup>th</sup> Street, is now and was at all times herein mentioned an open public street, highway and thoroughfare located within the City of St. Louis, State of Missouri.
4. On or about June 30, 2012, the motor vehicle operated by defendant Brady Heady, violated a stop sign and was caused to violently overtake, strike, and collide and T-bone the driver's side of the motor vehicle, which Plaintiff was a passenger in at the location described in paragraph 3.

5. At the time of the collision, Plaintiff was a passenger in an automobile travelling northbound on Lafayette.

6. As a direct result of the aforesaid occurrence, Plaintiff's head, neck, shoulders and arms and all of the bones, joints, muscles, tendons, ligaments, nerves, skin, vessels and invertebral discs thereof were caused to be severely bruised, contused, lacerated, sprained, strained, herniated, dislocated, and rendered swollen and inflamed. Plaintiff has suffered, and will suffer in the future, severe pain and mental anguish as a result thereof; and the use, movement and function of the aforesaid injured parts have been seriously and permanently impaired and diminished.

7. As a further and direct result of the aforesaid occurrence and the resulting injuries and damages sustained by Plaintiff, Plaintiff has been caused to undergo certain reasonable and necessary hospital and medical care and treatment, for which Plaintiff has been caused to incur or become indebted for an amount not yet determined, and Plaintiff will be caused to undergo further such care and treatment in the future and to incur or become indebted for further such large sums therefore.

8. As a further direct result of the aforesaid occurrence and the result of injuries and damages sustained by Plaintiff, Plaintiff's ability to work, labor, and to enjoy the ordinary pursuits of life have been severely impaired and diminished; Plaintiff has lost time and wages from employment in an amount not yet determined.

9. The aforesaid collision and the resulting injuries sustained by Plaintiff were directly and approximately caused by the negligence and carelessness of Defendant in the operation, maintenance, and control of his motor vehicle in the following respects, to wit:

- (a) Defendant Heady did operate his motor vehicle at a rate of speed that was high, excessive, and dangerous under the circumstances and conditions then and there existing.
- (b) Defendant Heady failed and omitted to keep and maintain a constant, careful, and vigilant watch and lookout ahead and laterally so as to see and discover the presence and movement of other vehicles at or near the aforesaid location.
- (c) Defendant Heady failed and omitted to stop his motor vehicle, slacken the speed thereof, change the course thereof, swerve the same aside, or sound a warning of her approach and movement when, in the exercise of the highest degree of care, he could and should have done so, and thus and thereby have avoided the aforesaid occurrence and resulting injuries sustained by Plaintiff.
- (d) Defendant Heady did, at the time and place aforesaid, negligently and carelessly cause and permit his motor vehicle to overtake, strike, and collide with the vehicle being occupied by Plaintiff.
- (e) Defendant Heady failed and omitted to yield to Plaintiff's vehicle.
- (f) Defendant Heady failed to stop at the stop sign controlling the intersection of Lafayette and S. 9<sup>th</sup> Street in violation of Section 302.270.1 (2) R.S.Mo.

WHEREFORE, Plaintiff Anthony Trupiano states that he has been damaged, for which damage he prays judgment against Defendant Brady Heady in such sum as may be fair and reasonable in the premises, but in excess of Twenty-Five Thousand Dollars (\$25,000.00), together with prejudgment interest and court costs in this behalf expended.

Respectfully submitted,

/s/ John A. Bouhasin  
John A. Bouhasin #49050  
Bouhasin Law Firm, P. C.  
5205 Hampton Avenue  
St. Louis, Missouri 63109-3102  
Tel: (314) 832-9600, ext. 102  
Fax: (314) 932-7672

bouhasinlaw@gmail.com

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system this 13<sup>th</sup> day of January 2016.

/s/ John A. Bouhasin

**IN THE CIRCUIT COURT OF THE CITY OF ST LOUIS  
STATE OF MISSOURI  
22<sup>nd</sup> JUDICIAL CIRCUIT**

**ANTHONY TRUPIANO,** )  
Plaintiff, )  
 ) Cause No.  
v. )  
 ) Division No.  
**BRADY HEADY,** )  
Defendant, ) JURY TRIAL DEMANDED  
 )  
**Serve Defendant at:** )  
1701 BLUE JAY COVE )  
ST LOUIS MO 63144 )

**REQUEST FOR ALIAS SUMMONS TO ISSUE**

COMES NOW Plaintiff, Anthony Trupiano, and requests alias summons be issued upon Defendant, Brady Heady, 1701 Blue Jay Cove, St. Louis, MO 63144, and to further appoint special process server, Mark Rodebaugh, Patriot Investigative Services, LLC, 5014 Alexander Street, St. Louis, MO 63116, to issue for Attorney for Plaintiff, John A. Bouhasin.

So Ordered,

---

Date: \_\_\_\_\_

Respectfully submitted,

*/s/ John A. Bouhasin*

John A. Bouhasin #49050  
Bouhasin Law Firm, P. C.  
5205 Hampton Avenue  
St. Louis, Missouri 63109-3102  
Tel: (314) 832-9600, ext. 102  
Fax: (314) 932-7672  
[bouhasinlaw@gmail.com](mailto:bouhasinlaw@gmail.com)

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was e-filed with the Clerk of the Court and Mark Rodebaugh at Patriot Investigative Services, LLC, at [merodebaugh@outlook.com](mailto:merodebaugh@outlook.com).

*/s/ John A. Bouhasin*

IN THE CIRCUIT COURT OF THE CITY OF ST LOUIS  
 STATE OF MISSOURI  
 22<sup>nd</sup> JUDICIAL CIRCUIT

ANTHONY TRUPIANO,  
 Plaintiff,

v.

BRADY HEADY,  
 Defendant,

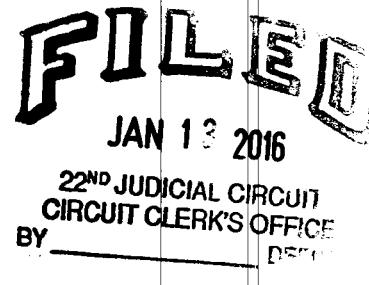
Serve Defendant at:

1701 BLUE JAY COVE  
 ST LOUIS MO 63144

) Cause No.

) Division No.

) JURY TRIAL DEMANDED



**REQUEST FOR ALIAS SUMMONS TO ISSUE**

COMES NOW Plaintiff, Anthony Trupiano, and requests alias summons be issued upon Defendant, Brady Heady, 1701 Blue Jay Cove, St. Louis, MO 63144, and to further appoint special process server, Mark Rodebaugh, Patriot Investigative Services, LLC, 5014 Alexander Street, St. Louis, MO 63116, to issue for Attorney for Plaintiff, John A. Bouhasin.

So Ordered,

Date: 1/13/16

Respectfully submitted,

/s/ John A. Bouhasin  
John A. Bouhasin #49050  
Bouhasin Law Firm, P. C.  
5205 Hampton Avenue  
St. Louis, Missouri 63109-3102  
Tel: (314) 832-9600, ext. 102  
Fax: (314) 932-7672  
[bouhasinlaw@gmail.com](mailto:bouhasinlaw@gmail.com)

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was e-filed with the Clerk of the Court and Mark Rodebaugh at Patriot Investigative Services, LLC, at [merodebaugh@outlook.com](mailto:merodebaugh@outlook.com).

/s/ John A. Bouhasin



## IN THE 22ND JUDICIAL CIRCUIT COURT OF CITY OF ST LOUIS, MISSOURI

Judge or Division: BRYAN L HETTENBACH	Case Number: 1622-CC00086	Process Server 1
Plaintiff/Petitioner: ANTHONY V. TRUPIANO	Plaintiff's/Petitioner's Attorney/Address JOHN A BOUHASIN 5205 HAMPTON ST LOUIS, MO 63109-3102	Process Server 2
vs.		Process Server 2
Defendant/Respondent: BRADY HEADY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Pers Injury-Vehicular		(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: BRADY HEADY

Alias:

1701 BLUE JAY COVE  
ST. LOUIS, MO 63144**SPECIAL PROCESS SERVER**

CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

JANUARY 13, 2016

Date

Thomas Kloepfinger  
Circuit Clerk

Further Information:

## Sheriff's or Server's Return

**Note to serving officer:** Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.  
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_ a person of the Defendant's/Respondent's family over the age of 15 years.  
 (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_

(name) \_\_\_\_\_ (title).

 other \_\_\_\_\_.

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis, MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time)).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Mileage \$ \_\_\_\_\_ ( \_\_\_\_ miles @ \$ . \_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



## IN THE 22ND JUDICIAL CIRCUIT COURT OF CITY OF ST LOUIS, MISSOURI

Judge or Division: BRYAN L HETTENBACH	Case Number: 1622-CC00086	Process Server 1
Plaintiff/Petitioner: ANTHONY V. TRUPIANO	Plaintiff's/Petitioner's Attorney/Address JOHN A BOUHASIN 5205 HAMPTON ST LOUIS, MO 63109-3102	Process Server 2
Defendant/Respondent: BRADY HEADY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	Process Server 2
Nature of Suit: CC Pers Injury-Vehicular		(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: BRADY HEADY  
Alias:  
1701 BLUE JAY COVE  
ST. LOUIS, MO 63144

## SPECIAL PROCESS SERVER



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

JANUARY 13, 2016

Date

*Thomas Kloepfinger*Thomas Kloepfinger  
Circuit Clerk

Further Information:

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.  
I certify that I have served the above summons by: (check one)

- delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.  
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.  
 (for service on a corporation) delivering a copy of the summons and a copy of the petition to

(name) \_\_\_\_\_ (title) \_\_\_\_\_

 other \_\_\_\_\_

Served at 1701 BLUE JAY COVE \_\_\_\_\_ (address)

in ST. LOUIS COUNTY (County/City of St. Louis), MO, on 1/14/16 (date) at 3:00 PM (time).

Printed Name of Sheriff or Server

*Mark Rodebaugh* Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal) Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date \_\_\_\_\_

Notary Public \_\_\_\_\_

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Mileage \$ \_\_\_\_\_ ( \_\_\_\_ miles @ \$ . \_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.